

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INGENUS PHARMACEUTICALS, LLC,

Plaintiff,

v.

HETERO USA, INC., HETERO LABS LTD.,
and HETERO LABS LTD. UNIT-VI,

Defendants.

C.A. No. 24-1025-JLH

MOTION TO STAY

Plaintiff Ingenus Pharmaceuticals, LLC (“Ingenus”) respectfully moves the Court to stay this action pending resolution of an appeal of final judgment of invalidity of U.S. Patent No. 10,993,952 (“the ’952 Patent”) in *Ingenus Pharm., LLC v. Nexus Pharm., Inc.*, No. 1:22-cv-02868 (N.D. Ill.), currently captioned on appeal as *Ingenus Pharmaceuticals, LLC v. Nexus Pharmaceuticals, Inc.*, Case No. 2025-1840 (Fed. Cir.). Pursuant to Local Rule 7.1.1, the undersigned avers that a reasonable effort has been made to reach agreement with counsel for Defendants on the matters set forth in the motion. The grounds for this motion are fully set forth in the opening brief in support of this motion, filed contemporaneously herewith.

Dated: June 13, 2025

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